

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA,)	
)	
<i>Plaintiff</i>)	
)	
v.)	Case No. 4:21-cr-005-O-1
)	
THE BOEING COMPANY,)	
)	
<i>Defendant.</i>)	
_____)	

**UNOPPOSED MOTION OF NAOISE CONNOLLY RYAN ET AL. FOR LEAVE TO FILE
AN UPDATED APPENDIX OF ADDITIONAL FAMILY SUPPORTERS OF THEIR
MOTION FOR FINDINGS THAT THE PROPOSED BOEING DEFERRED
PROSECUTION AGREEMENT WAS NEGOTIATED IN VIOLATION OF THEIR
RIGHTS**

Naoise Connolly Ryan et al. (the “victims’ families”), through undersigned counsel, respectfully submit this Unopposed Motion for Leave to Filed an Updated Appendix of Additional Family Supporters of Their Motion for Findings That the Proposed Boeing Deferred Prosecution Agreement was Negotiated in Violation of Their Rights.

On December 16, 2021, fifteen families filed their motion for a finding that the proposed Boeing deferred prosecution agreement was negotiated in violation of their rights under the Crime Victims’ Rights Act. Dkt. 15, as amended Dkt. 52. That motion included as an appendix a list of an additional 71 families who had loved ones killed in the two crashes who supported the motion. Dkt. 16, as re-filed in Dkt. 56 (refiling of original appendix to link to amended motion).

Since December 16, 2021, an additional 33 families have contacted counsel for the 15 victims’ families. *See* Attachment to this Motion (additional families listed as numbers 71 through 104). These 33 families have asked to have their names added to the list of supporters of this

motion, so that their killed family member will be recognized as supporting this motion. Accordingly, the 15 victims' families request leave to file the attached updated and enlarged appendix, listing all 104 families who support their motion.

The Government and Boeing do not oppose the motion.

CONCLUSION

This Court should provide the victims' families permission to file an updated appendix to their motion, listing 104 family supporters of the motion. A proposed order to that effect is attached.

Dated: February 24, 2022

Respectfully submitted,

/s/ Warren T. Burns

Warren T. Burns (Texas Bar No. 24053119)
Burns Charest, LLP
900 Jackson Street
Suite 500
Dallas, TX 75202
469-904-4550
wburns@burnscharest.com



Paul G. Cassell (Utah Bar No. 06078)
(Counsel of Record)
Utah Appellate Project
S.J. QUINNEY COLLEGE OF LAW
University of Utah
383 S. University St.
Salt Lake City, UT 84112
801-585-5202
cassellp@law.utah.edu
(no institutional endorsement implied)
(*pro hac vice*)

Attorneys for Victims' Families

CERTIFICATE OF CONFERENCE

Pursuant to Local Criminal Rule 47.1(b), on February 24, 2022, counsel for the Movants conferred with counsel for the United States of America and counsel for The Boeing Company via email. Counsel for The Boeing Company and the Government have stated they do not oppose the motion.

/s/ Paul G. Cassell
Paul G. Cassell

CERTIFICATE OF SERVICE

I certify that on February 24, 2022, the foregoing document was served on the parties to the proceedings via the Court's CM/ECF filing system.

/s/ Paul G. Cassell
Paul G. Cassell